

TECHNICAL SYSTEMS AUDIT CHECKLIST FOR SAMPLES COLLECTED DURING DISCHARGE

Purpose/Scope of Audit: GSI Research, Development, Testing, and Evaluation (RDTE) Facility Technical Systems Audit

Brief Description of Audit: Audit of sample labeling, collection, transport, and analysis at the GSI RDTE Facility during performance evaluation of the Siemens SiCURE Ballast Water Management System.

Auditee: GSI scientists

Audit Location: RDTE Facility (Superior, WI)

Auditors: Kelsey R. Prihoda, GSI Assistant Quality Assurance Manager

Audit Dates: Monday, August 31, 2009

SAMPLE BOTTLE LABELING, SAMPLE COLLECTION, AND SAMPLE TRANSPORT TO UWS

SAMPLE TEST ID: 09-SI-1D

Relevant GSI SOPs:

- GSI/SOP/G/RA/SC/3 – Procedure for Labeling Samples Collected at the GSI Land-Based RDTE Facility
- GSI/SOP/LB/G/O/5 – Procedure for Injecting Organisms and Solids into the GSI Land-Based RDTE Facility
- GSI/SOP/LB/RA/SC/3 – Procedure for Algae/Small Protozoa Sample Collection
- GSI/SOP/LB/RA/SC/4 – Procedure for Microbial Sample Collection
- GSI/SOP/LB/RA/SC/6 – Procedure for Zooplankton Sample Collection
- GSI/SOP/LB/RA/SC/3 – Procedure for Collecting Physical/Chemical Data and Samples at the GSI Land-Based RDTE Facility

| Sample Collection Type (Code) | Sample Port/Point | Tub Number | Sample Type (Collected By) | Labeled Correctly & In Crate? | | Collected Following SOPs? | | Transported Back to UWS? | |
|-------------------------------|-------------------|------------|-------------------------------|-------------------------------|---|---------------------------|---|--------------------------|---|
| | | | | Y | N | Y | N | Y | N |
| Control Tub (C) | SP9-C | 1 | Phytoplankton | ✓ | | ✓ 10:43 | | | |
| | | | Zooplankton | ✓ | | ✓ 10:48 | | | |
| | | | Microbe Rep. 1 | ✓ | | ✓ 10:43 | | | |
| | | | Microbe Rep. 2 | ✓ | | ✓ 10:43 | | | |
| | | | Microbe Rep. 3 | ✓ | | ✓ 10:44 | | | |
| | | | TRC and TRO | ✓ | | ✓ 10:44 | | | |
| | | | Disinfection Byproducts (2 L) | ✓ | | ✓ 10:44 | | | |

| Sample Collection Type (Code) | Sample Port/Point | Tub Number | Sample Type (Collected By) | Labeled Correctly & In Crate? | | Collected Following SOPs? | | Transported Back to UWS? | |
|--|-------------------|------------|---|-------------------------------|---|---------------------------|---|--------------------------|---|
| | | | | Y | N | Y | N | Y | N |
| Control Pre-Treatment In-Line (PT) C | SP10-C | | TSS Rep. 1 10 min. after discharge | ✓ | | ✓ 9:46 | | ✓ Heidi Saillard | |
| | | | TSS Rep. 2 30 min. after discharge | ✓ | | ✓ 10:00 | | ✓ | |
| | | | TSS Rep. 3 50 min. after discharge | ✓ | | ✓ 10:20 | | ✓ | |
| | | | | | | | | | |
| Treatment Tub #4 (T) | SP9-C | 4 | Phytoplankton | ✓ | | ✓ | | | |
| | | | Zooplankton | ✓ | | ✓ To be archived | | | |
| | | | Microbe | ✓ | | ✓ | | ✓ Heidi Saillard | |
| | | | + DWP TRC and TRO | ✓ | | ✓ | | | |
| Treatment Tub #5 (T) | SP9-B | 5 | Phytoplankton | ✓ | | ✓ | | | |
| | | | Zooplankton | ✓ | | ✓ To be analyzed | | | |
| | | | Microbe | ✓ | | ✓ | | ✓ Heidi Saillard | |
| | | | TRC and TRO | ✓ | | ✓ | | | |
| Treatment Tube #6 (T) | SP9-A | 6 | Phytoplankton | ✓ | | ✓ | | | |
| | | | Microbe | ✓ | | ✓ | | ✓ Heidi Saillard | |
| | | | TRC and TRO | ✓ | | ✓ | | | |
| | | | Whole Effluent (~38 L) | ✓ | | ✓ | | ✓ Christine Polkinghorne | |
| | | | Disinfection Byproducts (2 L) | ✓ | | ✓ | | ✓ Heidi Saillard | |
| Treatment In-Line (T) | ③ SP10-C TAP | | ① TSS, POC, DOC Rep. 1 - ~10 min. | ✓ | | ③ 11:54 not collected | | ✓ Heidi Saillard | |
| | | | TSS, POC, DOC Rep. 2 - ~30 min. | ✓ | | 12:00 | | ✓ to transport | |
| | | | TSS, POC, DOC Rep. 3 - ~50 min. | ✓ | | 12:20 | | ✓ | |
| | | | TSS, POC, DOC Rep. 3 - ~50 min. Duplicate | ✓ | | 12:20 | | ✓ | |
| | | | | | | | | | |
| Treatment Tank 2 | Mid-Depth | | TRC Monitoring - Day 4 | ✓ | | ✓ 11:58 | | | |

① TSS will be measured for water quality not POC or DOC.

② R.F. KNP 8-31-09

③ TSS will be collected from a tap off of the treatment line rather than SP10-C due to recirculation of T1 into C1 on "discharge" of T1. This sampling location does not have a pitot therefore, it may not be a valid location to collect TSS samples.

Page 2 of 7

Initial/Date

KNP/10-2-09

SAMPLE ANALYSIS

SAMPLE TEST ID: 09-SI-1D

QUALITY SYSTEM DOCUMENTATION

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|--|----------|---|----|----------|
| | Y | N | NA | |
| 1. Is there an approved Quality Assurance Project Plan for the overall project and has it been reviewed by all appropriate personnel? | | ✓ | | |
| 2. Is a copy of the current approved QA Project Plan maintained near laboratory work station areas? | | | ✓ | |
| 3. Is the implementation of the project in accordance with the QA Project Plan? | | | | |
| 4. Are there deviations from the QA Project Plan? Explain. | | | | |
| 5. Do any deviations from the QA Project Plan affect data quality? | | | | |
| 6. Are sample handling and storage procedures in accordance with the QA Project Plan? | | | | |
| 7. Are written and approved current standard operating procedures (SOPs) used in the project? If so, list them and note whether they are maintained near laboratory work station areas? | | | | |
| 8. Are data/observations appropriately recorded in laboratory notebooks/forms according to the QA Project Plan (i.e., entries in ink, dated, initialed, corrections done properly)? Are data contained in bound, well-labeled notebooks or three-ring binders? | | | | |
| 9. Do supervisory and/or QA personnel inspect laboratory notebooks/forms on a regular basis and initial notebook after review? | | | | |
| 10. Are paper records written in indelible ink? | | | | |
| Additional Questions or Comments: | | | | |
| | | | | |

CHEMISTRY

Relevant GSI SOPs:

- GSI/SOP/BS/RA/C/2 – Procedure for Determining Total Residual Oxidants (TRO) in Water
- GSI/SOP/BS/RA/C/3 – Procedures for Measuring Organic Carbon in Aqueous Samples
- GSI/SOP/BS/RA/C/6 – Procedure for Analyzing Total Residual Chlorine (TRC) Concentrations in Water
- GSI/SOP/BS/RA/C/8 – Procedure for Analyzing Total Suspended Solids (TSS)

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|---|----------|---|----|----------|
| | Y | N | NA | |
| 1. Describe the analytical instrumentation. List the brand and model number for each instrument. | | | | |
| 2. Are calibration and maintenance logs kept for the instrumentation (e.g., balances and other equipment)? | | | | |
| 3. Review the maintenance and operational records for the equipment. Based on your findings, do all instruments/equipment appear to be in good operating condition? | | | | |
| 4. Are the manufacturer's operating manuals readily available to the instrumentation operators? | | | | |
| 5. Describe the routine calibration procedure. | | | | |
| 6. Does the calibration documentation show that the calibration procedures are being followed? | | | | |
| 7. Do the calibration standards have the appropriate levels (i.e., bracket the samples to be measured)? | | | | |
| 8. What is the instrumentation calibration error according to the calibration documentation? | | | | |
| 9. Are duplicate samples collected and analyses conducted on at least 10% of the physical/chemical samples? | | | | |
| 10. Are reagent blank samples analyzed with each set of samples? | | | | |
| 11. Are a minimum of three and preferably more standards required for standard curves? | | | | |
| 12. When applicable, do routine procedures that require standard curves bracket concentrations? | | | | |
| 13. When applicable, have analytical method detection limits been established and clearly documented? | | | | |
| Additional Questions or Comments: | | | | |

MICROBIOLOGY *UMP Reviewed Datasheets 23 October 2009 and 26 October 2009*

Relevant GSI SOPs:

- GSI/SOP/BS/RA/MA/1 – Procedure for Quantifying Heterotrophic Plate Counts (HPCs) using IDEXX's SimPlate® for HPC Method
- GSI/SOP/BS/RA/MA/3 - Procedure for the Detection and Enumeration of Enterococcus using Enterolert™
- GSI/SOP/BS/RA/MA/4 – Procedure for the Detection and Enumeration of Total Coliforms and E. coli using IDEXX's Colilert®

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|--|----------|---|----|--|
| | Y | N | NA | |
| 1. Are duplicate sample analyses conducted on at least 10% of the microbiology samples? | | ✓ | | duplicates done on fill, not on discharge. |
| 2. Are at least 10% of the samples counted by a second qualified individual (i.e., QA count)? | ✓ | | | No QA count for E. coli, Ent, or V.C. QA count for HPC. |
| 3. Are reagent blank samples analyzed with each set of samples? <i>UMP 26 Oct. 09</i> | ✓ | | | |
| 4. When applicable, have analytical method detection limits been established and clearly documented? | ✓ | | | |
| Additional Questions or Comments: <i>Control discharge samples 10:43-10:44 collected, time of receipt in lab not recorded. Treatment discharge samples collected ~12:45 pm, time of receipt in lab not recorded. Unless control and treatment samples neutralized / analyzed at the same time, there is no data recorded for control samples. TJJ proofed data entry 05 Oct. 2009. KRP verified 10% discharge sample calculations 26 Oct. 2009.</i> | | | | |

PHYTOPLANKTON

Relevant GSI SOPs: *Reviewed datasheets 19 October 2009. UMP*

- GSI/SOP/LB/RA/SA/1 – Procedure for Algae/Small Protozoan Sample Analysis

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|--|----------|---|----|---|
| | Y | N | NA | |
| 1. Were all data, observations, and comments appropriately recorded on the "Ballast Water Plankton Count Sheet"? | ✓ | | | Time of control analysis must be an error. Sample not collected until 10:43 am. |
| 2. Was sample assessment conducted within ~1-1.5 hours after sample collection? | | | | cannot be determined from datasheet. |
| 3. Were at least 10% of the samples counted by a second analyst (i.e., QA count)? | | ✓ | | No QA count done on Trial 1. |

Additional Questions or Comments:

"Conc. sample vol." not recorded on treatment tank sample, assuming the sample was concentrated

ZOOPLANKTON

Relevant GSI SOPs:

- GSI/SOP/BS/RA/C/2 – Procedure for Zooplankton Sample Analysis

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|--|----------|--------------------|----|---|
| | Y | N | NA | |
| 1. Were all data, observations, and comments appropriately recorded on the "Zooplankton Identification Worksheet"? | ✓ | But see "Comments" | | Data missing Tub 4 data sheet - time completed, initials, temp. Time completed missing tub 5. |
| 2. Was sample assessment conducted within ~2 hours after sample collection? | ✓ | | | Started control at "11:10 am", done at "12:44". |
| 3. Were at least 10% of the samples counted by a second analyst (i.e., QA count)? | ✓ | | | QA count was done on control fill for trial #1. |

Additional Questions or Comments:

Zooplankton analysis will be done on one tub only instead of pooling 2 tubs and splitting them. Analysis will be conducted on Tub 5 and Tub 4 will be archived. Subsamples 1 and 2 (rotifer) had greater than 450 total organisms per slide,

this is an SOP deviation as no more than 200 organisms should be present in a 1-ml subsample.

WHOLE EFFLUENT TOXICITY (WET)/COLD WATER BIOASSAY (CWB) TESTING

Relevant GSI SOPs:

- GSI/SOP/BS/RA/RT/6 – Procedure for Assessing Chronic Residual Toxicity of a Ballast Treatment System to *Ceriodaphnia dubia*
- GSI/SOP/BS/RA/RT/7 – Procedure for Assessing Chronic Residual Toxicity of a Ballast Treatment System to the Fathead Minnow (*Pimephales promelas*)
- GSI/SOP/BS/RA/RT/8 – Procedure for Assessing Chronic Residual Toxicity of a Ballast Water Treatment System to the Green Alga (*Selenastrum capricornutum*) DRAFT

| AUDIT QUESTIONS | RESPONSE | | | COMMENTS |
|--|----------|----------------|----|--|
| | Y | N | NA | |
| 1. Were all data, observations, and comments appropriately recorded on pre-printed data sheets | ✓ | See comments → | | No initials under "Prepared By" column in Stock solution datasheets. |

Solution datasheets.
Page 6 of 7

P. promelas Initial/Date
Day 4 datasheet KUP/10-26-09
only partially filled out.

| | | | | |
|--|---|-------------------------|---|--|
| and/or laboratory notebooks? | | | | |
| 2. Were all relevant standard operating procedures followed (see above)? | ✓ | Deviations noted below. | | |
| 3. Was an organism QA count done on at least 10% of the test chambers by a second, qualified analyst? | ✓ | except algae WET test. | no. young c. dubia not verified on Day 3. No QA count for algae WET test. | |
| Additional Questions or Comments: Christine Polkinghorne transported ~38L whole effluent collected from Tub 6 at ~12:30 pm. SOP deviations: <i>C. dubia</i> were fed half the required amount of YCT and algae as directed in GSI/SOP/BS/RA/RT/6. | | | | |

- ② *C. dubia* test set up from 2:39 - 3:10 pm. Day 1 renewal from 9:18 - 9:34 am. This is less time than directed in the SOP. Organisms exposed to Day 0 water for ~19 hours.

Additional Questions and Comments on Technical Systems Audit:

Control Drain started at 9:46 am.

Treatment Drain started at 11:30 am.

S. capricornutum WET test: On test day 2 MT noted that clumps of algae began to form in the test chambers. On test day 3 MT noted that many of the flasks were "milky white". This may be evidence of bacterial contamination. The test results did not pass the QA/QC parameters specified in GSI/SOP/BS/RA/RT/8 (Draft). This WET test is invalid.

SOP Deviations *P. promelas* WET test: ① Day 0, organisms added to test chambers from 2:00 - 2:29 pm. Day 1, renewal from 10:13 - 11:19 pm. There were ~20 hours between day 0 and 1 renewal, which is less than 24 ± 2 hours specified in SOP: GSI/SOP/BS/RA/RT/7.
② Fatheads were fed three times on test renewal day 3, instead of two times as specified in the SOP.

Fathead test termination: 0% - Rep. 3 has 16 surviving larvae but days 0-6 there was 15 larvae in that chamber.